

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Yolanda Warren Debtor(s)  Citizens Bank, N.A. f/k/a RBS Citizens, N.A. Objectant(s)  v.  Yolanda Warren Respondent(s)	Chapter 13 Proceeding  No. 20-11732 AMC
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OBJECTION TO CONFIRMATION OF THE PLAN

Citizens Bank, N.A. f/k/a RBS Citizens, N.A., a secured creditor in this case objects to the Plan and to the confirmation of the debtor's Chapter 13 Plan and as grounds therefor would show the court the following:

1. The Plan does not provide for the secured creditor, Citizens Bank, N.A. f/k/a RBS Citizens, N.A. to receive the full value of its claim in violation of 11 USC §1325(a)(5)(B)(ii).
2. As of the date of the filing of the bankruptcy on March 20, 2020, Citizens Bank, N.A. f/k/a RBS Citizens, N.A. is the holder of a secured claim in the amount of \$38,165.80 against the debtor's property located at 2716 Welsh Road, Philadelphia, PA 19152. On that date the arrears to be paid through the plan were \$11,466.44. A Proof of Claim was filed by Citizens Bank, N.A. f/k/a RBS Citizens, N.A. on or about August 10, 2020. See Exhibit "A" attached hereto and made a part hereof.
3. Debtor's Plan makes no provision for the payment of Citizens Bank, N.A. f/k/a RBS Citizens, N.A.'s arrears claim.

4. If the Plan is confirmed the Citizens Bank, N.A. f/k/a RBS Citizens, N.A. will suffer irreparable injury, loss and damage.

Respectfully submitted,

/s/ Mary F. Kennedy  
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